

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE
NEW YORK, N.Y. 10007

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(yr., mo., & day)

F NJ D055935902

A

820212

I. NAME OF INSTALLATION

KLEINER METAL SPECIALTIES INC

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

34315 NEW BRUNSWICK AVENUE

CITY OR TOWN

ST.

ZIP CODE

SOUTH PLAINFIELD NJ 07080

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 SAME AS ABOVE

CITY OR TOWN

ST.

ZIP CODE

6 SAME AS ABOVE

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

2 KENNETH N CAVE VP ENGINEERING

201-752-6722

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 UNIFORM TUBES INC

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL
M = NON-FEDERAL

M

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☐ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

INSPECTION REPORT

REPORT PREPARED FOR:

- ☒ Generator
☐ Transporter
☐ HWM (TSD) Facility

FACILITY INFORMATION

Name: KLEINER metal specialties
Address: 4315 New Brunswick ave
South Plain Field
Lot: 3 Block: 472
County: Middlesex
Phone: (201) 752-6722
EPA ID #: NJD055935902
Date of Inspection: 11/23/87

PARTICIPATING PERSONNEL

State or EPA Personnel: Peter Taylor
WOLF SKACEL
Facility Personnel: Mr. Cave

Report Prepared by Name: Peter Taylor
Region: Central
Telephone #: (609) 426-0700
Reviewed by: Linda Z. Jordan
Date of Review: 11-30-87

TO: File RoomFROM: P. Taylor Through L. JordanDATE: 11/23/87SUBJECT: Kleiner Metal Specialties

This Facility is ~~very~~ clean. The system used to handle their hazardous waste was impressive. It is, however, against the Regulations. They pump virgin and reclaimed 1,1,1-trichloroethane from 250gal tanks, use it to clean metal parts, and pump it ~~to~~ to a 250gal "dirty" tank. The dirty 1,1,1-trichloroethane is pumped to a small still, purified, and returned to the reclaimed tank. Still tailings are pumped to another 250gal tank and labeled as hazardous waste. The tanks are diked and fenced. They have manifested waste in the past approximately ^{annually} every 18 months. Kleiner has just ~~made an~~ ^{arranged} with a transporter, Baker/Blakeslee, to pick up the waste ^{every 90 days} ~~every month~~.

I cited Kleiner for the following:

- 7.26-12.1(a) ^{according to the manifests,} illegal storage over 90 days, and for storing in a tank
- 7.26-9.4(g) 2 The instructor has received no training
- 7.26-9.4(g) 6i There are no job titles for the people handling the hazardous waste
- 7.26-9.4(g) 6ii There are now job descriptions for the hazardous waste job titles
- 7.26-9.4(g) 8 There have been no semi-annual fire drills
- 7.26-9.7 The Facility has no contingency plan

CONFIDENTIAL
RECOMMENDATIONS

TO: File

DATE: 11/23/87

FROM: P. Taylor through Linda Jordan

SUBJECT: Aluminum metal specialties (RECRA)

Mr. Cave was very cooperative and seemed willing to correct his deficiencies. He is going to write to DHWM-BHWE to obtain a letter of approval for his ~~new~~ Hazardous waste storage tank for 290 days (25) present to NSAC and recommend minimum 736-9308).
penalty as long as Mr. Cave continues to correct his deficiencies in a timely manner

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS

THIS FACILITY WAS STARTED IN 1970 WHEN THE 1ST 12,000 SQFT SHOP WAS BUILT. ANOTHER 12,000 SQFT WAS ADDED IN 1980. THERE ARE 35 SHOP EMPLOYEES AND 13 OFFICE EMPLOYEES. THE FACILITY OPERATES ON A 8H/DAY; 5 DAY/1 WEEK SCHEDULE.

KLEINER RECEIVES TUBING IN STOCK LENGTH AND COILS. THIS TUBING, RANGING FROM MICRO TO MACRO IN SIZE, IS CUT TO VARIOUS LENGTHS AND MACHINED AS NECESSARY. THEY WORK IN VARIOUS METALS INCLUDING STAINLESS AND ROLLED STEEL, BRASS, COPPER, AND BRONZE. ALL PRODUCTS ARE CUSTOM JOBS MADE TO ORDER. NO FINISHED INVENTORY OR EXTRA STOCK. MATERIALS ARE KEPT ON HAND.

Describe the activities that result in the generation of hazardous waste.

- ① III TRICHLOROETHANE IS USED IN CLEANING METAL PARTS
THIS IS DISTILLED AND REUSED. THE STILL ^{bottoms} ~~bottoms~~
ARE THE HAZARDOUS WASTE AND ARE STORED IN A 250 GAL
TANK. UP UNTILL THIS TIME TETRACHLOROETHYLENE
WAS USED.
- ② CUTTING OILS AND SOLUTIONS (MAGNUS) ARE REUSED WITH
NO WASTE

Identify the hazardous waste located on site, and estimate the approximate quantities of each.
(Identify Waste Codes)

FOOL - III TRICHLOROETHANE; NEW PROCESS
JUST STARTED. UNDETERMINED AMOUNT OF HAZARDOUS
WASTE IN 250 GAL TANK. SOME "DIRTY" SOLVENT
IN ANOTHER 250 GAL TANK AWAITING DISTILLATION.
THE LAST MANIFESTED LOAD WAS ON 11/5/87 WHEN
ALL OF THE TETRACHLOROETHYLENE WAS SHIPPED
OFF SITE

1 GAL OF FOOS (TOLUENE) IS KEPT ON SITE
FOR USE IN THE LABATORY. THIS IS USED TO
BRUSSEY SAMPLES & AS YET NO WASTE HAS BEEN
PRODUCED.

RCRA LAND RESTRICTION F-SOLVENT
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

A. Handler Name KLEINER METAL SPECIALTIES B. Street (or other identifier) 4315 New Brunswick Ave
C. City SOUTH PLAINFIELD D. State NJ E. Zip Code 07080 F. County Name Middlesex
G. Nature of Business; Identification of Operations METAL SPECIALISTS, MICRO-MACRO TUBING PRODUCTS
H. EPA ID # NJD 055935902

I. Handler Contact (Name and Phone Number) Mr. Cave, Engineer (201) 752-6722

II. GENERATOR COMPLIANCE

A. F-Solvent Identification

1. Does the handler generate the following wastes?

a. F001	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
b. F002	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
c. F003	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

If an F003 wastestream listed solely for ignitability has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? ☐ Yes ☒ No

d. F004	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
e. F005	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

2. Source of the above: Form 8700-12 ☐; Part A ☐; Part B ☐;
other (specify) MSDS sheet

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A. Note concerns below: no mixing

B. BDAT Treatability Group - Treatment Standards Identification

Comments

1. Did the generator correctly determine the appropriate treatability group [268.41] of the waste (Wastewaters containing solvents, pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

Yes ☒ No

C. Waste Analysis

1. Did the generator determine whether the waste exceeds treatment standards based on [268.7(a)]:

a. Knowledge of wastes ☒ Yes ☐ No

b. TCLP ☐ Yes ☒ No

c. Other (specify) _____

If knowledge, note how this is adequate:

ONLY USE 1 material

If determined by TCLP, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note any problems: _____

- d. Were wastes tested using TCLP when a process or wastestream changed?

DOES NOT change ☐ Yes ☒ No

2. Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]? ☒ Yes ☐ No
☐ Some

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [268.3] ☐ Yes ☒ No

D. Management

1. Onsite management

a. Were F-solvent wastes managed onsite? ☐ Yes ☒ No

If yes, answer 1(b) and (c); if no, answer 2.

- b. For wastes that exceed treatment standards, was treatment, storage, and/or disposal conducted?
___ Yes ___ No

If yes, TSDf Checklist must be completed.

- c. Are test results maintained in the operating record [264.74(b)3/265.73(b)(3)]?
___ Yes ___ No

2. Offsite Management

- a. If F-solvent wastes exceed treatment standards, did generator provide treatment facility [268.7(a)(1)]:

- (i) EPA waste number? ☒ Yes ___ No
(ii) Applicable treatment standard? ___ Yes ☒ No *OK JS.*
(iii) Manifest number? ☒ Yes ___ No
(iv) Waste analysis data, if available? ___ Yes ☒ No

Identify offsite treatment facilities Manisac

- b. If F-solvent wastes did not exceed treatment standards, did generator provide the disposal facility [268.7(a)(2)]: *Na*

- (i) EPA Hazardous waste number? ___ Yes ___ No
(ii) Applicable treatment standard? ___ Yes ___ No
(iii) Manifest number? ___ Yes ___ No
(iv) Waste analysis data, if available? ___ Yes ___ No
(v) Certification that waste meets treatment standards? ___ Yes ___ No

Identify land disposal facilities receiving the BDAT certified wastes _____

- c. If waste is subject to nationwide variance [268.30] (e.g., solvent-water mixtures less than 1%), case-by-case extension [268.5] or petition [268.6] does generator provide notice to disposer that waste is exempt from land disposal restrictions [268.7(a)(3)]?

NA
✓
____ Yes ____ No

E. Storage of F-Solvent Waste

1. Was F-solvent waste stored for greater than 90 days (after variance 180/270 days for SQG) [268.50(a)(1)]?

✓
____ Yes ____ No

If yes, was facility operating as a TSD under interim status or final permit?

____ Yes ✓ No

If yes, TSDF Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes?

✓
____ Yes ____ No

If yes, list type of treatment unit and processes

DISTILLATION - BANNON/BLAKESLEE

If the residuals from a RCRA-exempt treatment unit are above the treatment standards, the owner/operator is considered a generator of restricted waste. The inspector should determine whether the generator requirements, particularly waste identification requirements, have been met for the treatment residuals.

APPENDIX A

Comments

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
carbon tetrachloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorinated fluorocarbons	<input type="checkbox"/> Yes	<input type="checkbox"/> No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichlorofluoromethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,2-trichloro-1,2,2-trifluoroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ortho-dichlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
acetone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl acetate	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl benzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl ether	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methyl isobutyl ketone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
n-butyl alcohol	<input type="checkbox"/> Yes	<input type="checkbox"/> No
cyclohexanone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methanol	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If the F003 wastestream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic? ☐ Yes ☐ No

Comments

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid
nitrobenzene

____ Yes ____ No
____ Yes ____ No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene
methyl ethyl ketone
carbon disulfide
isobutanol
pyridine

____ Yes ____ No
____ Yes ____ No
____ Yes ____ No
____ Yes ____ No
____ Yes ____ No

6. Are any of the constituents listed in the questions 1-5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Chemical carriers?

____ Yes ____ No

If the answer is yes, list the constituents.

(b) Degreasing/cleaning?

____ Yes ____ No

If the answer is yes, list the constituents.

(c) Diluents?

____ Yes ____ No

If the answer is yes, list the constituents.

Comments

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid
nitrobenzene

____ Yes ____ No
____ Yes ____ No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene
methyl ethyl ketone
carbon disulfide
isobutanol
pyridine

____ Yes ____ No
____ Yes ____ No
____ Yes ____ No
____ Yes ____ No
____ Yes ____ No

6. Are any of the constituents listed in the questions 1-5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Chemical carriers?

____ Yes ____ No

If the answer is yes, list the constituents.

(b) Degreasing/cleaning?

____ Yes ____ No

If the answer is yes, list the constituents.

(c) Diluents?

____ Yes ____ No

If the answer is yes, list the constituents.

Comments

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid	<input type="checkbox"/> Yes	<input type="checkbox"/> No
nitrobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methyl ethyl ketone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
carbon disulfide	<input type="checkbox"/> Yes	<input type="checkbox"/> No
isobutanol	<input type="checkbox"/> Yes	<input type="checkbox"/> No
pyridine	<input type="checkbox"/> Yes	<input type="checkbox"/> No

6. Are any of the constituents listed in the questions 1-5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Chemical carriers? ☐ Yes ☐ No

If the answer is yes, list the constituents.

(b) Degreasing/cleaning? ☐ Yes ☐ No

If the answer is yes, list the constituents.

(c) Diluents? ☐ Yes ☐ No

If the answer is yes, list the constituents.

Comments

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid
nitrobenzene

____ Yes ____ No
____ Yes ____ No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene
methyl ethyl ketone
carbon disulfide
isobutanol
pyridine

____ Yes ____ No
____ Yes ____ No
____ Yes ____ No
____ Yes ____ No
____ Yes ____ No

6. Are any of the constituents listed in the questions 1-5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Chemical carriers?

____ Yes ____ No

If the answer is yes, list the constituents.

(b) Degreasing/cleaning?

____ Yes ____ No

If the answer is yes, list the constituents.

(c) Diluents?

____ Yes ____ No

If the answer is yes, list the constituents.

(d) Extractants?

___ Yes ___ No

Comments

If the answer is yes, list the constituents.

(e) Fabric scouring?

___ Yes ___ No

If the answer is yes, list the constituents.

(f) Reaction and synthesis media?

___ Yes ___ No

If the answer is yes, list the constituents.

If questions 1-6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? A solvent is considered "spent" when it has been used and is no longer used without being regenerated, reclaimed, or otherwise reprocessed. ___ Yes ___ No
8. If the waste is a mixture of constituents as determined in questions 1-7, answer this to determine whether it is a "solvent mixture" covered by the listings.

If the wastestream is mixed and contains more than one of the F001-F005 constituents listed in questions 1-5 (by volume), give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5% methylene chloride
2% trichloroethylene
25% 1,1,1-trichloroethane
68% mineral spirits
100%

If the wastestream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

Comments

With respect to the F003 solvent wastes, if, before use, the wastestream is mixed and contains only F003 constituents, it is a listed waste. For example:

33% acetone
16% methanol
51% ethyl ether
100%

If the wastestream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste.
For example:

50% xylene F003
12% TCE F001
38% mineral spirits
100%

If in light of the above, the handler appears to be generating F001-f005 hazardous wastes, refer this facility to the enforcement official for follow-up actions verifying the use of solvents at the facility.

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

TRANSPORTER CHECKLIST

I. FACILITY IDENTIFICATION

A. Site Name _____ B. Street (or other identifier) _____

C. City _____ D. State _____ E. Zip Code _____ F. County Name _____

G. Description of Operations _____

H. EPA ID # _____

I. Facility Contact (Name and Phone Number) _____

II. TRANSPORTER REQUIREMENTS

Comments

A. Does the transporter store restricted wastes for greater than 10 days [268.50(a)(3)]? _____ Yes _____ No

1. If yes, does transporter have 264/265 status as storage facility (e.g., has submitted part A?) _____ Yes _____ No

B. Does a review of records indicate storage of restricted wastes for greater than 10 days? _____ Yes _____ No

C. Describe inventory controls to ensure that restricted wastes are not stored for greater than 10 days. _____

ID Number: _____
Inspector: _____
Date: _____

DRAFT
RCRA F-SOLVENT LAND RESTRICTION
TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

I. FACILITY IDENTIFICATION

A. Facility Name _____ B. Street (or other identifier) _____
C. City _____ D. State _____ E. Zip Code _____ F. County Name _____
G. Nature of business; identification of operations _____
H. EPA ID # _____

I. Facility Contact (Name and Phone Number) _____

II.A. For onsite facilities, complete the generator checklist Comments

B. General Facility Standards

1. Was waste analysis plan revised to cover Part 268 requirements [264.13 or 265.13]?
_____ Yes _____ No
2. Did facility obtain representative chemical and physical analysis of wastes and residues [264.13(a)/265.13(a)]?
_____ Yes _____ No
 - a. Did testing include analyses for all F001-F005 constituents?
_____ Yes _____ No
 - b. Were analyses performed using TCLP? _____ Yes _____ No
 - c. Were analyses conducted onsite or offsite (identify offsite lab)?
_____ On _____ Off:

 - d. Describe frequency of sampling _____

 - e. Describe procedures used to identify manifest discrepancies _____

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]? _____ Yes _____ No

Comments

C. Storage [268.50]

1. a. Were restricted wastes exceeding treatment standards stored? ☐ Yes ☐ No
If no, go to "D."
- b. Are all containers clearly marked to identify content and date(s) entering storage? ☐ Yes ☐ No
- c. Do operating records track the location, quantity and dates that waste exceeding treatment standards entered and were removed from storage? ☐ Yes ☐ No
- d. Do operating records agree with container labeling? ☐ Yes ☐ No
- e. Is waste exceeding treatment standards stored for less than 1 year? ☐ Yes ☐ No
If yes, can you show that such accumulation is not necessary to facilitate proper recovery, treatment, or disposal? ☐ Yes ☐ No
If yes, state how: _____
- f. Were tanks emptied at least once per year, and do operating records show that volume of waste removed from tanks annually at least equals tank volume? ☐ Yes ☐ No
- g. Was/is waste exceeding treatment standards stored for more than one year? ☐ Yes ☐ No
If yes, state the owner/operator's proof that such storage was solely for the purposes of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal: _____
- h. Are F-solvent wastes exceeding treatment standards "stored" in surface impoundments? ☐ Yes ☐ No

D. Treatment in Surface Impoundments [268.4]

1. Were F001-F005 wastes exceeding treatment standards placed in surface impoundments for treatment? ☐ Yes ☐ No
If no, go to E.

Comments

2. Did the facility submit a certification of compliance with minimum technology and ground water monitoring requirements, and the waste analysis plan to the Agency? ☐ Yes ☐ No
3. Have the minimum technology requirements been met? ☐ Yes ☐ No
- a. If the minimum technology requirements have not been met, has a waiver been granted for that unit(s)? ☐ Yes ☐ No
4. Have the Subpart F ground-water monitoring requirements been met? ☐ Yes ☐ No
5. Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan and are the results in the operating record [264.13/265.13] and [264.73/265.73]? ☐ Yes ☐ No
- 6.. Did the hazardous waste residue (sludge or liquid) exceed the treatment standards specified in [268.41]? ☐ Yes ☐ No
- 7.. Provide the frequency of analyses conducted on treatment residues: _____
- 8.. Does the operating record adequately document the results of waste analyses performed in accordance with [268.41] and [264.73/265.73] ☐ Yes ☐ No
- 9.. Have the hazardous waste residues that exceed the treatment standards [268.41] been removed adequately and on an annual basis? ☐ Yes ☐ No
- a. If answer is no and supernatant is determined to exceed treatment concentrations, is annual throughput greater than impoundment volume? ☐ Yes ☐ No
10. If residues were removed annually, were adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed? ☐ Yes ☐ No
11. When removed, were solvent wastes managed subsequently in another surface impoundment? ☐ Yes ☐ No

12. When removed, were wastes treated prior to disposal?
_____ Yes _____ No
- a. If yes, are waste residues treated on or offsite?
_____ Onsite _____ Offsite
- b. Identify management method _____

Comments

E. Treatment

1. Did the facility operate treatment facilities for F-solvent waste (not including surface impoundments)?
_____ Yes _____ No
- If no, go to "F."
2. Describe the treatment processes for F-solvent wastes.

3. Does the facility, in accordance with an acceptable waste analysis plan, verify that the residue extract from all treatment processes for the F-solvent wastes are less than treatment standards [268.7(b)(2)]?
_____ Yes _____ No
4. Describe frequency of testing of treatment residuals.

5. Was dilution used as a substitute for treatment [268.3]?
_____ Yes _____ No
6. Are certifications and results of waste analyses kept in the operating record [264.73(b)(3)/265.73(b)(3)] and [268.7(c)]?
_____ Yes _____ No
7. Are notice with waste number, treatment standard, manifest number, and analytical data (where available) submitted for each shipment of waste or treatment residual that meets the treatment standard stating that waste has been treated to treatment performance standards [268.7(b)]?
_____ Yes _____ No
8. Are certifications submitted for each shipment [268.7(b)(2)(i)]?
_____ Yes _____ No

F. Land DisposalComments

1. Were F-solvent wastes placed in land disposal units (landfills, surface impoundments [for this question, do not include if in "D"] waste piles, wells, land treatment units, salt domes/beds, mines/caves concrete vault or bunker? ☐ Yes ☐ No

2. Did facility have the notice and certification from generators/treaters in its operating record [268.7(c); 268.7(a),(b)]? ☐ Yes ☐ No

3. Did the facility obtain waste analysis data through testing of the waste to determine that the wastes are in compliance with the applicable treatment standards [268.7(c)]? ☐ Yes ☐ No

If yes, at what frequency? _____

4. Were F-solvent wastes exceeding the treatment standards placed in land disposal units excluding national capacity variances [268.30(a)]? ☐ Yes ☐ No

If yes, did facility have an approved waiver based on no migration petition [268.6] or approved case-by-case capacity extension [268.5] or treatment standard variance [268.44]? ☐ Yes ☐ No

5. Were F-solvent wastes subject to a national or case-by-case capacity variance/extension disposed? ☐ Yes ☐ No

a. If yes, were these wastes disposed of in a facility that has a new, replacement, or laterally expanded landfill or impoundment? ☐ Yes ☐ No

If (a) is yes, have the minimum technology requirements been met for all such units at the facility [268.5(h)(2)] and [268.30(b)]? ☐ Yes ☐ No

6. Were adequate records of disposal maintained? ☐ Yes ☐ No

7. If wastes subject to a nationwide variance [268.30], case-by-case extensions [268.5], or no migration petitions [268.6] were disposed, does facility have notices [268.7(a)(3)] and records of disposal? ☐ Yes ☐ No

8. What is the volume of F-solvent waste disposed to date by waste? _____

ID Number: _____
Inspector: _____
Date: _____

9. If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports [268.5]?

Comments

___ Yes ___ No

APPENDIX B
TREATMENT STANDARDS FOR F-SOLVENTS

F001-F005 SPENT SOLVENTS	CONCENTRATION (IN MG/L)	
	WASTEWATERS	OTHER WASTES
Acetone	0.05	0.59
N-butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
1,2-dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichloro 1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

Waste No.	Substance	Waste No.	Substance	Waste No.	Substance
U005	Acetamide, N-(3-methyl-2-pyridyl)	U183	Benzene, perfluorinated	U262	Diesel
U112	Acetic acid, ethyl ester (I)	U185	Benzene, perfluorinated	U263	Dinitro (A, T)
U144	Acetic acid, ethyl ester	U200	Benzene, perfluorinated	U264	Dinitro (A, T)
U214	Acetic acid, triethyl ester	U207	Benzene, 1,2,4,5-tetrahydro-	U265	Dinitro (A, T)
U002	Acetone (I)	U223	Benzene, 1,2,4,5-tetrahydro-	U266	Dinitro (A, T)
U003	Acetone (II)	U224	Benzene, 1,2,4,5-tetrahydro-	U267	Dinitro (A, T)
U004	Acetone (III)	U225	Benzene, 1,2,4,5-tetrahydro-	U268	Dinitro (A, T)
U005	2-Acetylaminofluorene	U226	Benzene, 1,2,4,5-tetrahydro-	U269	Dinitro (A, T)
U006	Acetyl chloride (C, R, T)	U227	Benzene, 1,2,4,5-tetrahydro-	U270	Dinitro (A, T)
U007	Acetyl chloride	U228	Benzene, 1,2,4,5-tetrahydro-	U271	Dinitro (A, T)
U008	Acetic acid (I)	U229	Benzene, 1,2,4,5-tetrahydro-	U272	Dinitro (A, T)
U009	Acetic acid	U230	Benzene, 1,2,4,5-tetrahydro-	U273	Dinitro (A, T)
U150	Alkene, 3-(2,4-dichlorophenyl)-	U231	Benzene, 1,2,4,5-tetrahydro-	U274	Dinitro (A, T)
U248	Alkene, 3-(2,4-dichlorophenyl)-	U232	Benzene, 1,2,4,5-tetrahydro-	U275	Dinitro (A, T)
U328	Alkene, 3-(2,4-dichlorophenyl)-	U233	Benzene, 1,2,4,5-tetrahydro-	U276	Dinitro (A, T)
U353	Alkene, 3-(2,4-dichlorophenyl)-	U234	Benzene, 1,2,4,5-tetrahydro-	U277	Dinitro (A, T)
U328 and U353	Alkene, 3-(2,4-dichlorophenyl)-	U235	Benzene, 1,2,4,5-tetrahydro-	U278	Dinitro (A, T)
U011	Alkene	U236	Benzene, 1,2,4,5-tetrahydro-	U279	Dinitro (A, T)
U012	Alkene	U237	Benzene, 1,2,4,5-tetrahydro-	U280	Dinitro (A, T)
U014	Alkene	U238	Benzene, 1,2,4,5-tetrahydro-	U281	Dinitro (A, T)
U015	Alkene	U239	Benzene, 1,2,4,5-tetrahydro-	U282	Dinitro (A, T)
U016	Alkene	U240	Benzene, 1,2,4,5-tetrahydro-	U283	Dinitro (A, T)
U157	Benzene, 1,2,4,5-tetrahydro-	U241	Benzene, 1,2,4,5-tetrahydro-	U284	Dinitro (A, T)
U018	Benzene, 1,2,4,5-tetrahydro-	U242	Benzene, 1,2,4,5-tetrahydro-	U285	Dinitro (A, T)
U019	Benzene, 1,2,4,5-tetrahydro-	U243	Benzene, 1,2,4,5-tetrahydro-	U286	Dinitro (A, T)
U020	Benzene, 1,2,4,5-tetrahydro-	U244	Benzene, 1,2,4,5-tetrahydro-	U287	Dinitro (A, T)
U021	Benzene, 1,2,4,5-tetrahydro-	U245	Benzene, 1,2,4,5-tetrahydro-	U288	Dinitro (A, T)
U022	Benzene, 1,2,4,5-tetrahydro-	U246	Benzene, 1,2,4,5-tetrahydro-	U289	Dinitro (A, T)
U023	Benzene, 1,2,4,5-tetrahydro-	U247	Benzene, 1,2,4,5-tetrahydro-	U290	Dinitro (A, T)
U024	Benzene, 1,2,4,5-tetrahydro-	U248	Benzene, 1,2,4,5-tetrahydro-	U291	Dinitro (A, T)
U025	Benzene, 1,2,4,5-tetrahydro-	U249	Benzene, 1,2,4,5-tetrahydro-	U292	Dinitro (A, T)
U026	Benzene, 1,2,4,5-tetrahydro-	U250	Benzene, 1,2,4,5-tetrahydro-	U293	Dinitro (A, T)
U027	Benzene, 1,2,4,5-tetrahydro-	U251	Benzene, 1,2,4,5-tetrahydro-	U294	Dinitro (A, T)
U028	Benzene, 1,2,4,5-tetrahydro-	U252	Benzene, 1,2,4,5-tetrahydro-	U295	Dinitro (A, T)
U029	Benzene, 1,2,4,5-tetrahydro-	U253	Benzene, 1,2,4,5-tetrahydro-	U296	Dinitro (A, T)
U030	Benzene, 1,2,4,5-tetrahydro-	U254	Benzene, 1,2,4,5-tetrahydro-	U297	Dinitro (A, T)
U031	Benzene, 1,2,4,5-tetrahydro-	U255	Benzene, 1,2,4,5-tetrahydro-	U298	Dinitro (A, T)
U032	Benzene, 1,2,4,5-tetrahydro-	U256	Benzene, 1,2,4,5-tetrahydro-	U299	Dinitro (A, T)
U033	Benzene, 1,2,4,5-tetrahydro-	U257	Benzene, 1,2,4,5-tetrahydro-	U300	Dinitro (A, T)
U034	Benzene, 1,2,4,5-tetrahydro-	U258	Benzene, 1,2,4,5-tetrahydro-	U301	Dinitro (A, T)
U035	Benzene, 1,2,4,5-tetrahydro-	U259	Benzene, 1,2,4,5-tetrahydro-	U302	Dinitro (A, T)
U036	Benzene, 1,2,4,5-tetrahydro-	U260	Benzene, 1,2,4,5-tetrahydro-	U303	Dinitro (A, T)
U037	Benzene, 1,2,4,5-tetrahydro-	U261	Benzene, 1,2,4,5-tetrahydro-	U304	Dinitro (A, T)
U038	Benzene, 1,2,4,5-tetrahydro-	U262	Benzene, 1,2,4,5-tetrahydro-	U305	Dinitro (A, T)
U039	Benzene, 1,2,4,5-tetrahydro-	U263	Benzene, 1,2,4,5-tetrahydro-	U306	Dinitro (A, T)
U040	Benzene, 1,2,4,5-tetrahydro-	U264	Benzene, 1,2,4,5-tetrahydro-	U307	Dinitro (A, T)
U041	Benzene, 1,2,4,5-tetrahydro-	U265	Benzene, 1,2,4,5-tetrahydro-	U308	Dinitro (A, T)

[illegible]

Accession Number	Substance
See FC27	Silver
J089	4,4'-Dibromodiphenyl ether
J206	Stearositolin
J135	Sulfur hydride
J103	Sulfonic acid, dimethyl ester
J188	Sulfur phosphine (A)
J205	Sulfur sesquioxide (A)
See FC27	2,4,5-T
J207	* 2,4,5-Tetrachlorobenzene
J208	* * 2-Tetrachlorobenzene
J208	* * 2,2-Tetrachlorobenzene
J210	Tetrachlorobenzene
See FC27	2,3,4,6-Tetrachloroaniline
J213	Tetramethylenurea (I)
J214	Tetramethyl acetate
J215	Tetramethyl carbonate
J216	Tetramethyl chloride
J217	Tetramethyl nitrate
J218	Tetradecane
J153	Tetrahydrofuran (I, T)
J219	Thiourea
J244	Thymol
J220	Thylene
J221	Thioacetamide
J223	* Thylene dithiocarbamate (A, T)
J222	* Thiourea hydrochloride
J228	Thiodione
J353	Thiodione
J328 and J353 added by 50 FR 42942 October 21 1985	
J011	Tri-2,4-Triazole-3-amine
J226	* 1,1-Trichlorobenzene
J227	* 1,2-Trichlorobenzene
J228	Trichlorobenzene
J228	Trichlorobenzene
J221	Trichloromonomerofluorobenzene
See FC27	2,4,5-Trichloroaniline
J231	2,6,6-Trichloroaniline
G*	2,4,5-Trichlorobenzenesulfonic acid
J234	tri-2,4-trichlorobenzene (A, T)
J182	* 3,5-Triazane, 2,4,5-trimethyl-
J235	Tri(2,3-dibromoisopropyl) phosphine
J236	* typen oil
J237	Uracil, 5-[bis(2-chloromethylamino)-]
J237	Uracil mustard
J042	Vinyl chloride
J248	Warfarin, when present at concentrations of 0.3% or less.
J***	Xylene (I)
-	gamma-gamma-(16-carboxylic acid, 11,17-dimethyl- oxy)-16-[(17,4,5-trimethylbenzoyloxy)-] methyl ester
J219	Zinc phosphide, when present at concentrations of 10% or less.
	(J248 added by 46 FR 19823, May 10, 1981)

RECORD OF COMMUNICATION		<input type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE	
		<input type="checkbox"/> OTHER (SPECIFY) _____	
		(Record of item checked above)	
TO: File	FROM: Jim Sullivan (AWK) HUC	DATE 	TIME
SUBJECT Kleiner Metal NID055935902			
SUMMARY OF COMMUNICATION <p> - They had notifications & Forwarded copies to NJDEP Inspector </p> <p> - NJDEP BHWE working on >90 day storage violation associated with tank apparatus </p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED 			
INFORMATION COPIES TO: 			

Facility: KLEINER METAL SPEC.

Loc: Middlesex

SIC:

ID: NJD055935902

Inspection Date: 7/29/93

Review Date: 10/18/93

Fac. Pers: Kenneth Cave

Region: Central

Review: K. Few

Title: V.P. - Engineering

Inspection: Doug Greenfield

Notification Date:

Tele: 908-752-6722

Inspection Type: OEI

Start: File NOV 2007

Site: Gen Trans TSD

State Act:

Initiative:

Recv TSD:

Refer:

On Prog:

Vol/Mo:

Test Units:

Comm Date:

GW Wells: NONE

Stop Units: 4

Info:

Permits: AIR

Waste Codes:

Operation: Produces small tubular components for hermetically sealed products.

Inspection Comm (date, re, outcome):

Process:

Tubular material shipped and cleaned machines have own dies

MW Gen:

D001 (Solvent)

Waste Codes:

TSD:

Doc Req:

MW De: Knowl

TCA

TCLP

Fac Comm (date, re, outcome):

Manf Rev: 4

Out

0

Code:

LDR

Stop:

Manf

Date

Code

Def

Doc Req:

TSD Comm (date, re, outcome):

Fac Notes:

Violation:

Storage area not inspected daily

OJT not provided.

Local authorities not contacted.

Doc Req:

NOV 2007 Other

On:

Comp. Sched:

Achieved:

C. Plan not sent

Notes:

Site: by epf. ref

to local authorities

No LDR Violations

Compl Hist:

IDate

Viol

Class

Act

Req Docs:

File Docs:

EPA Action	Date Issued	Due Date	Extension Req	New Date	Date Rec'd	Site/Comments
1						

FILE #: 12 - 22 -

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
& ENERGY

DIVISION OF FACILITY WIDE ENFORCEMENT

BUREAU: CBWHWE

GENERATOR INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: KLEINER METAL SPECIALTIES

EPA ID NUMBER: ND055935902 CASE NUMBER: _____

STREET ADDRESS: 4315 NEW BRUNSWICK AVE

MUNICIPALITY: SOUTH PLAINFIELD ZIP: 07080 COUNTY: MIDDLESEX

MAILING ADDRESS: _____
(if different)

BILLING ADDRESS: _____
(if different)

TELEPHONE # (908) 752-6722 FAX # (908) 752-5917

BLOCK : _____ LOT : _____

FACILITY PERSONNEL: KENNETH CAVE, VICE PRESIDENT - ENGINEERING
(name & title)

INSPECTION DATE: JULY 29, 1993

INSPECTOR'S NAME & TITLE: DOUG GREENFIELD, SR ENV. ENG.

OTHER STATE/EPA PERSONNEL: _____

REPORT PREPARED BY: DOUG GREENFIELD

REVIEWED BY: _____ DATE OF REVIEW: _____
DFWE 29 REV. 2/22/93

INSPECTION DATE(S): _____
TIME IN: _____
TIME OUT: _____

PHOTOS TAKEN: YES (____) NO (____) QUANTITY (____) ATTACH
PHOTO LOG

SAMPLES TAKEN: YES (____) NO (____) HOW MANY (____) ATTACH
SAMPLE LOG

SITE BACKGROUND INFORMATION

EMPLOYEES: 52 SHIFTS/WEEK: 10

DATE OPERATIONS BEGUN: 1965 SIC CODE: _____

ACRES: 1.28 # OF BUILDINGS/SQFT: 1 / 12800

PRODUCTS PRODUCED: SMALL METAL TUBULAR COMPONENTS

PREVIOUS OPERATIONS AT SITE: OPEN SPACE

WATER SUPPLY- PUBLIC: ✓ PRIVATE WELL: _____

SOLID WASTE DISPOSAL: SOUTH PLAIN FIELD

FLOOR DRAINS: 2

DRAINS CONNECTED TO- POTW: ✓ SEPTIC SYSTEM: _____

MONITORING WELLS: NONE

NON-HW. TANKS ON SITE : 4

AIR PERMITS: YES 4 - 1-Degreaser 3 air cleaners

NJPDES PERMITS: NONE

OTHER PERMITS: NONE

Kleiner Metal Specialties
4315 New Brunswick Avenue
South Plainfield, NJ

NJD005935902

Kleiner Metals Specialties (KMS) has been located on a 1.28 acre tract in South Plainfield, Middlesex County since 1967. They occupy a 28,500 square building with 52 employees working 10 shifts a week.

KMS is a subsidiary of Uniform Tubes, Inc. (UTI) located in Collegeville, Pennsylvania. KMS produces small tubular components which are used in a variety of hermetically sealed products, silicone control rectifiers and diodes, color TV tubes, sodium vapor lamps, stereo equipment, cameras, medical devices, home appliances, Tantalum capacitors, etc. They also produce a line of coated tubular electrodes to electrochemically machine small holes in turbine engine blades which power both aircraft and stationary power generating stations. Diesel igniters are made here for GM.

The facility receives all their tubular material from Uniform Tubes. The tubes are shipped in 20' lengths and in rolls of 300' to 600'. The size of these tubes vary from .015" to .525" OD and as small as .010" ID. The parts produced from these tubes vary in length from .20" to 5.5". There are 48 small and 4 large machines on site. The machines are setup to produce specific products. Parts from these machines are produce at rates from 40 to 600 a minute.

The tubular material that comes in from UTI are cleaned with a solvent (D001) to remove any metal dust particles which might close the small inside opening. The ends of the tubes are then cut square. These tubes are then fed through one of the machines depending on the product. Each machine has its own die setup and when a new or different part is needed the dies are changed which takes over 8 hours. Only 5 or 6 machines are operating at any one time. Metal working oil is used in this process but most of it is recycle.

The finished parts are then taken to the degreasing unit which holds 30 gallons of 111-trichloroethane which is the only solvent that can clean the small parts adequately. The solvent in the unit is changed automatically twice a day. The used solvent is pumped to a 220 gallon tank marked used solvent. When this tank is full it is automatically pumped to a still to be reclaimed. This solvent is then put in a 220 gallon tank marked reconditioned solvent. This is the tank where the degreasing tank is refilled which is done automatically.

Periodically fresh solvent is added to the system. When the operator feels that the reconditioned solvent is not cleaning adequately the used tank of solvent is shipped off site as Hazardous Waste.

Kleiner Metal Specialties
4315 New Brunswick Avenue
South Plainfield, NJ

NJD005935902

Toured the facility and observed that the degreasing system was completely hard piped and everything was done automatically. The used metal oil was drummed as was the used tube cleaner (D001). Asked about daily inspection when waste is on site a was told none were taken.

Returned to the office and found their manifests in compliance. The facility did not send copies of their contingency plan to the local authorities. The facility did not have any training program that addressed hazardous waste.

Cited the following violation:

- 9.4(d)5 Failure of facility owner or operator to perform daily inspections of each area where containers are stored.
- 9.4(g) Failure of facility owner or operator to provide required classroom or on-the-job training for facility personnel.
- 9.6(f) Failure of facility owner or operator to make required arrangements with police or fire departments, emergency response contractors, equipment suppliers, or local hospitals or to document any such authority's refusal of such arrangements. (Specifically (f)3)
- 9.7(i) Failure of contingency plan to be maintained at the facility with a copy sent to local police or fire departments, hospitals or state or local emergency response teams.

HAZARDOUS WASTE INVENTORY

[illegible]

add additional pages as needed

GENERATOR INDEX

CHECK THE SECTIONS AND ACTIVITIES OF THIS REPORT WHICH ARE APPLICABLE TO THE FACILITY AND COMPLETE THOSE SECTIONS FOR THIS INSPECTION.

GENERATOR WASTE MANAGEMENT PRACTICES

<u>#</u>	<u>SECTION</u>	<u>PAGE</u>
1.	WASTE DETERMINATION	7. <input checked="" type="checkbox"/>
2.	GENERATOR STATUS	8. <input checked="" type="checkbox"/>
3.	SATELLITE STORAGE AREAS	9. <input type="checkbox"/>
4.	< 90 DAY CONTAINER STORAGE AREAS	10. <input checked="" type="checkbox"/>
5.	WASTE OIL USAGE	11. <input checked="" type="checkbox"/>
6.	< 90 DAY ABOVE GROUND TANKS STORAGE AREAS	12. <input type="checkbox"/>
7.	WASTE MANAGEMENT PRACTICES	13. <input checked="" type="checkbox"/>
8.	GENERATOR MANIFESTS	14. <input checked="" type="checkbox"/>
9.	EXPORTING HAZARDOUS WASTE	16. <input type="checkbox"/>
10.	CONTINGENCY PLAN & EMERGENCY PROCEDURES	17. <input checked="" type="checkbox"/>
11.	PERSONNEL TRAINING	19. <input checked="" type="checkbox"/>
12.	PREPAREDNESS & PREVENTION	21. <input checked="" type="checkbox"/>
13.	"WASTE WATER TREATMENT UNIT" QUALIFICATION	23. <input type="checkbox"/>

SECTION 1.WASTE DETERMINATION:

YES NO

DOES the facility generate "solid waste". _____DOES the facility generate a "hazardous waste". _____

IS THE FACILITY CORRECTLY CLASSIFYING ITS WASTES? _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

8.5(a) Generator failed to determine
if its "solid waste" is hazardous? _____7.4(x) Generator FAILED to properly classify
its waste according to the "Hierarchy". _____COMMENTS

SECTION 2.

GENERATOR STATUS

YES NO

Does the generator generate/accumulate >100 kg of hazardous waste (1kg acutely) or greater than 1001 gal of listed waste oil in any calender month?
(except x725 - 100 kg rule applies)

IF YES,

7.4(a)1 Does the Generator have an EPA ID number.

 ✓

IF THE GENERATOR IS A SQG.,

Does the generator wish to deactivate his EPA ID. number?

COMMENTS

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

SECTION 3.SATELLITE ACCUMULATION AREAS

IS THE FACILITY IN COMPLIANCE WITH THE
SATELLITE ACCUMULATION REGULATIONS?

YES NO

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

9.3(d)1 Quantity of waste EXCEEDS 55 gal. or
1 qt. of acutely hazardous waste.

9.3(d)2 Containers FAIL to:

Meet the standards of 7.2
(Container Requirements).

Poor or leaking container.

Container made of incompatible material.

Container not kept securely closed.

9.3(d)3 Accumulation area is:

NOT at or near a point of generation.

NOT under the control of the operator.

9.3(d)4 Containers are NOT marked
"Hazardous waste".

9.3(d)5 Containers NOT marked with date
when filled.

9.3(d)6 Containers were NOT moved from
satellite area within three days.

COMENTS

SECTION 4.

GENERATOR CONTAINER STORAGE AREAS

YES NO

IS THE FACILITY IN COMPLIANCE WITH THE
GENERATOR STORAGE REGULATIONS?

____ ✓

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

-
- | | | |
|------------|--|----------|
| 7.2(a) | <u>NO</u> manifest number on containers ready for disposal. | _____ |
| 7.2(b) | Containers <u>FAILED</u> to meet DOT regulations. (49 CFR 171,179) | _____ |
| 9.3(a)1 | Waste <u>ACCUMULATED</u> OVER 90 DAYS. | _____ |
| 9.3(a)3 | Containers <u>NOT</u> marked with accumulation start date or "Hazardous Waste". | _____ |
| 9.4(d)1i | Containers <u>NOT</u> of adequate construction. | _____ |
| 9.4(d)1ii | Closures <u>NOT</u> of sufficient strength. | _____ |
| 9.4(d)2 | Containers <u>NOT</u> in good condition. | _____ |
| 9.4(d)3 | Containers <u>NOT</u> compatible with waste. | _____ |
| 9.4(d)4i | Containers <u>NOT</u> kept closed. | _____ |
| 9.4(d)4iii | Containers <u>NOT</u> properly handled. | _____ |
| 9.4(d)4iv | Hazardous wastes <u>NOT</u> segregated. | _____ |
| 9.4(d)4v | ID Labels <u>NOT</u> visible. | _____ |
| 9.4(d)5 | Accumulation area <u>NOT</u> inspected daily. | <u>✓</u> |
| 9.4(d)6 | Containers of ignitable and reactive wastes are <u>NOT</u> located at least 50 feet from the facility's property line. | _____ |
| 9.6(d) | Access to communication or alarm system is <u>NOT</u> maintained. | _____ |
| 9.6(e) | <u>INADEQUATE</u> aisle space. | _____ |

SECTION 5WASTE OIL

YES NO

IS THE FACILITY IN COMPLIANCE WITH THE
WASTE OIL STORAGE REGULATIONS?

✓

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

The generator ONLY generates or accumulates less
than 1001 gals. of waste oil per month and:

7.7(d) Generator FAILED to obtain receipts
and retain them for three years.

9.2(b) If under ground tanks are used to
store waste oil, the generator
is NOT a:

1. New commercial service
station waste oil tanks
of <1001 gal capacity*

or does NOT:

2. Use underground tanks in
existence and in use for
Hazardous Waste storage
prior to 1/17/83.

NOTE: If the generator accumulates over 100 kg of
hazardous waste and <1001 gal of waste oil,
he must manifest off the waste oil but does
not have to comply with subchapter 9 require-
ments for waste oil. If the generator accum-
ulates >1001 gal of waste oil in any given
month he MUST be in compliance with ALL
generator requirements.

COMMENTS:

SECTION 6.ABOVE GROUND TANKS

IS THE FACILITY IN COMPLIANCE WITH THE ABOVE
GROUND <90 DAY STORAGE TANK REGULATIONS?

YES NO

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

If the generator stores hazardous waste in an above ground
tank for <90 days, the generator FAILED to:

- 9.3(b) Have a letter of approval? _____
- 9.3(b)2 Have overfilling controls? _____
- 9.3(b)3 Have secondary containment? _____
- 9.3(b)4 Insure that 99% of the tank can be
emptied? _____
- 9.3(b)5 Empty the tank every 90 days? _____
- 9.3(b)6 All wastes removed from the tank(s)
to authorized facility? _____
- 9.3(b)8 If part of the tank is below grade, all
of the tank cannot be visually inspected. _____
- 9.3(b)9 The tank is not labeled with the
words "HAZARDOUS WASTE". _____

COMMENTS

SECTION 7.

WASTE MANAGEMENT

IS THE FACILITY IN COMPLIANCE WITH THE WASTE
MANAGEMENT REGULATIONS?

YES NO
✓ _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

12.1(a) Generator IS ACTING as a TSDF by:

1. Treating hazardous waste. _____

2. Storing hazardous waste. _____

3. Disposing of hazardous waste on
site? _____

9.3(a)1 The generator FAILS to ship hazardous
waste off site within 90 days. _____

9.2(a)2 Hazardous waste IS handled in a manner
which causes or may cause a spill. _____

N.J.S.A. 58:10-23.11(c)

Discharge of a hazardous substance. _____

N.J.S.A. 58:10-23.11(e)

Failure to report the discharge. _____

IF THE FACILITY IS ACTING AS A TSDF, COMPLETE THE TSD
REPORT.

COMMENTS:

SECTION 8.GENERATOR MANIFESTS

YES NO

IS THE FACILITY IN COMPLIANCE WITH THE GENERATOR
MANIFEST REGULATIONS?

✓ _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE

7.4(a)3	Generator <u>FAILED</u> to prepare a Hazardous Waste Manifest.	_____
7.4(a)4	Each manifest <u>failed</u> to have the following information:	
7.4(a)4i	Generator's name, mailing address (site address if different), and phone number.	_____
7.4(a)4ii	The generator's EPA ID number.	_____
7.4(a)4iii	The transporter(s) name, phone number, NJ registration and decal numbers.	_____
7.4(a)4iv	The transporter(s) EPA ID number.	_____
7.4(a)4v	The name, address and phone number of the designated TSD facility.	_____
7.4(a)4vi	The TSDF's EPA ID number.	_____
7.4(a)4vii	The proper USDOT description.	_____

OR

	Complete NOS information in item J.	_____
7.4(a)4viii	Special handling instructions.	_____
7.4(a)5i	The generator signature.	_____
7.4(a)5ii	Transporter's signature & date.	_____
7.4(a)5iii	Generator <u>FAILED</u> to retain copy and forward copies to the state of origin & state of destination.	_____
7.4(a)5v	Generator <u>FAILED</u> to give the remaining copies to hauler.	_____

SECTION 10.CONTINGENCY PLAN AND EMERGENCY PROCEDURES

YES NO

IS THE FACILITY IN COMPLIANCE WITH THE CONTINGENCY
PLAN & EMERGENCY PROCEEDURES REGULATIONS? _____ ✓

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

- | | | |
|--------|--|---------|
| 9.7(a) | <u>NO</u> written contingency plan. | _____ |
| 9.7(b) | Generator <u>FAILED</u> to implement the plan in an emergency. | _____ |
| 9.7(c) | Plan <u>FAILED</u> to describe the response actions facility personnel and local authorities shall take. | _____ |
| 9.7(d) | Generator has a DPCC or SPCC plan, and <u>FAILED</u> to amend that plan to incorporate hazardous waste management. | _____ |
| 9.7(e) | Plan <u>FAILS</u> to describe arrangements agreed to by local authorities. | _____ |
| 9.7(f) | Plan <u>FAILS</u> to list names, addresses, and phone numbers (office and home) of emergency coordinators. | _____ |
| 9.7(g) | Plan <u>FAILS</u> to include a list, location, AND CAPABILITIES of all emergency equipment. | _____ |
| 9.7(h) | Plan <u>FAILS</u> to describe evacuation procedures, evacuation signal(s) AND routes. | _____ |
| 9.7(i) | Generator <u>FAILED</u> to: | |
| | 1. Keep a copy of the plan at the facility. | _____ |
| | 2. Submit the contingency plan to local authorities. | _____ ✓ |

9.7(j) Generator FAILED to revise the contingency plan when:

1. Applicable regulations are revised. _____
2. The plan fails. _____
3. The facility changes. _____
4. The Emergency Coordinator changes. _____
5. The emergency equipment changes. _____

9.7(k) Emergency coordinator NOT available. _____

COMMENTS

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SECTION 11.PERSONNEL TRAINING

IS THE FACILITY IN COMPLIANCE WITH THE
PERSONNEL TRAINING REGULATIONS?

YES NO

_____ ✓

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

NO - TRAINING PROGRAM ✓

- 9.4(g)2 Training program NOT directed by a person trained in hazardous waste management procedures and, is it NOT designed to ensure that facility personnel are able to respond effectively. _____
- 9.4(g)3 Program FAILS to include the following response procedures:
- 9.4(g)3i Use of personnel safety equipment. _____
- 9.4(g)3ii Procedures for using facility emergency and monitoring equipment. _____
- 9.4(g)3iii Key parameters for automatic waste feed cut-off systems. _____
- 9.4(g)3iv Procedures for utilizing communications or alarm systems. _____
- 9.4(g)3v Response procedures for fires & explosions. _____
- 9.4(g)3vi Ground water contamination responds procedures. _____
- 9.4(g)3vii Shutdown procedures. _____
- 9.4(g)4 Personnel have NOT successfully completed training within six months of the date of their employment or assignment to a new position at the facility. _____
- 9.4(g)5 Personnel do NOT take part in an annual review of training. _____
- 9.4(g)6 NO written documentation of the following:
- 9.4(g)6i Job title for each position and the name of the employee filling each job. _____

94(9)6ii	A written job description.	_____
9.4(g)6iii	Description of the training given to personnel.	_____
9.4(g)6iv	Documentation of actual training.	_____
9.4(g)7	Training records are <u>NOT</u> kept.	_____
9.4(g)8	Semi-annual drills, involving all employees and local authorities are <u>NOT</u> conducted.	_____

AND,

9.4(g)8i Generator FAILED to petition the Department for an exemption from the drill requirement.

OR

9.4(g)8ii Generator FAILED to petition the Department for an exemption excluding local officials.

COMMENTS

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SECTION 12.PREPAREDNESS AND PREVENTION

IS THE FACILITY IN COMPLIANCE WITH THE
PREPAREDNESS & PREVENTION REGULATIONS?

YES NO

____ ✓

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

9.6(b) Facility FAILS to have:

9.6(b)1 Communications or alarm system. _____

9.6(b)2 A telephone or device to summon
emergency assistance. _____

9.6(b)3 Portable emergency equipment. _____

9.6(b)4 Adequate Water supply. _____

9.6(c) Generator FAILED to test and
maintain emergency equipment. _____

9.6(f) Generator FAILED to:

9.6(f)1 Familiarize Police, fire depart-
ments, and emergency response
teams with the layout of the
facility, & hazardous waste handled. _____

9.6(f)2 Have an agreement designating
primary emergency authority to a
specific police and fire department
where more than one Police and fire
department are involved. _____

9.6(f)3 Make agreements with emergency
response contractors, and
equipment supplier. ✓

9.6(f)4 Make arrangements to familiarize
local hospitals with the properties
of hazardous waste handled at the
facility and the types of injuries
result from fires, explosions,
or discharges at the facility. _____

9.6(f)5 Make arrangements with local fire
departments to inspect the
facility on a regular basis with
at least two (2) inspections
annually. _____

9.6(f)6

Document when authorities
identified in (f)1 through 5
above declined to enter into
such arrangements.

COMMENTS:

SECTION 13.WASTE WATER TREATMENT PLANT SLUDGE

FACILITY _____

EPA ID. No. _____ FILE No. _____

DOES THE FACILITY OPERATE A SLUDGE DRYING UNIT? _____

IF YES, OBTAIN THE FOLLOWING INFORMATION:

1. "WASTE WATER TREATMENT UNIT" QUALIFICATION PER
7:14A-4.3

Is the drying unit part of a waste water treatment facility which is subject to regulation under sections 402 or 307(b) of the federal Clean Water Act? _____

Note: In order to be considered "part of" the facility, the dryer need not be physically connected to the W.W.T. Facility, but must be located at the same site.

Describe the relationship between the dryer and the W.W.T. Facility.

Describe how the sludge is moved from the W.W.T. Facility to the dryer.

Does the drying unit treat a sludge which is generated on site by the wastewater treatment facility? _____

Is the sludge to be treated a regulated hazardous waste as defined at N.J.A.C. 7:26-8? _____

If yes, what is the waste classification code? _____

Does the drying unit meet the definition of a "tank" at N.J.A.C. 7:14A-4.3? _____

Note: "Tank" means a stationary device designed to contain an accumulation of hazardous waste and constructed of non-earthen materials which provide the structural strength to totally contain the waste. Dryers that are integrally equipped with feed or discharge hoppers for treatment of sludge in bulk satisfy the definition of "tank". Others not so designed may still be considered tanks on a case-by-case basis.

Provide a physical description of the drying unit.

2. PRIMARY PURPOSE RESTRICTION

Is the primary purpose of the dryer to dehydrate sludge, AND NOT to destroy sludge in order to produce an ash residue. _____

3. THERMAL INPUT LIMITATION

What is the dryer's maximum volume of sludge that the drying unit can hold? _____

What is the heating capacity of the drying unit in kilowatts or BTU/minute? _____

What is the maximum drying time? _____

What is unit weight of the sludge (lbs/cuft)? _____

THIS INFORMATION SHOULD BE SUBMITTED BY THE INSPECTOR TO BHWE FOR A PERMIT EXEMPTION DETERMINATION.

CONFIDENTIAL - RECOMMENDATIONS

TO: FILE _____ DATE

FROM: _____

SUBJECT: _____

EPA. ID. #: _____ INSPECTION DATE: _____

COMMENTS:

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RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility Name: KLEINER METAL SPECIALTIESU.S. EPA ID#: NJD 055935902 SIC Code: _____Street: 4315 NEW BRUNSWICK AVECity: SOUTH PLAINFIELD State: N.J. Zip: 07080Telephone #: (908) 752-6722 Telefax #: (908) 752-5917Inspection Date: 7-29-93 Time: 1000 AM.

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone #</u>
Inspectors:	<u>DOUG GREENFIELD</u>	<u>NJ DEPE</u>	<u>(609) 584-4200</u>

Facility Reps*: KENNETH CAVE VICE PRESIDENT - ENGINEERING (908) 752-6722

* - Primary Environmental Contacts

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
F020-F023 & F026-F028	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
California List	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
First Third	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Second Third	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Third Third	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>

INSPECTION SUMMARY

Processes that Generate LDR Wastes:

- FOO1 - 111 trichloroethane generated from degreasing of parts.
- DOO1 - From tube cleaner used before cutting. (Magnus Solvent 1265)
- X726 - Waste cutting oil.

LDR Waste Management:

Certification and notifications are shipped with each shipment of Hazardous Waste.

Summary of Potential LDR Violations:

No Potential LDR violations noted during this inspection

Inspector Name and Title: DOUG GREENFIELD, PRINCIPAL ENVIRONMENTAL ENGINEER

Signature: Douglas Greenfield

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?

Yes ☒ No ☐

If no, list below:

Assigned Classification

Correct Classification

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ☒ No ☐ NA ☐

Comments: _____

3. Has multi-source leachate been assigned the F039 waste code [40 CFR 261.31]?

Yes ☐ No ☐ NA ☒

If yes, was single-source leachate combined to form multi-source leachate [55 FR22623]?

Yes ☐ No ☐

Comments: _____

II. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard (* wastewater vs. non-wastewater) for each F-solvent?

Yes ☒ No ☐ NA ☐

If No, list below:

Waste Code

Assigned Classification

Correct Classification

Comments: _____

* < 1% by weight total organic carbon (TOC), < 1% by weight total F001-F005 solvent constituents listed in 40 C.F.R. Table CCWE [40 C.F.R. 268.2(f)(1)]

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard (* wastewater vs. non-wastewater) for each dioxin waste?

Yes _____ No _____ NA ☒

If no, list below:

<u>Waste Code</u>	<u>Assigned Classification</u>	<u>Correct Classification</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

Comments: _____

* < 1% TOC by weight and < 1% total suspended solids (TSS) by weight [40 C.F.R. 268.2(f)]

3. First, Second, and Third Third Wastes:

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste (i.e. subcategory and * wastewater vs. non-wastewater)?

Yes ☒ No _____ NA _____

If no, list below:

<u>Waste Code</u>	<u>Assigned Subcategory</u>	<u>Correct Subcategory</u>	<u>Assigned wastewater vs. nonwastewater designation</u>	<u>Correct wastewater vs. nonwastewater designation</u>
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

* < 1% TOC by weight and < 1% TSS with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 C.F.R. 268.2(f)(2) and (3)]

Comments: _____

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9(b)]

Yes _____ No ☒ NA _____

- c. Does the generator specify alternative treatment standards for lab packs?

Yes _____ No _____ NA ☒

If yes, do lab packs only contain the following wastes* ? [40 CFR 268.42(c)(2)]

_____ Organometallics: 40 Part 268, Appendix IV constituents
 _____ Organics: 40 Part 268, Appendix V constituents

* Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multi-source leachate?

Yes _____ No _____ NA ☒

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes [55 FR 22675] ?

a. Liquid hazardous wastes containing PCB's \geq 50 ppm

Yes _____ No _____ NA ☒

If yes, check the appropriate treatability group:

_____ 50 to 500 ppm PCB's

_____ \geq 500 ppm PCB's

b. Listed or characteristic wastes containing \geq 1,000 mg/l (liquids) or mg/kg (non-liquids) HOC's, which are not listed or characterized by the HOC content.

Yes _____ No _____ NA ☒

If yes, check the appropriate treatability group:

_____ Dilute HOC wastewater (1,000 mg/l-10,000mg/l HOCs)

_____ All other HOC's greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain \geq 134 mg/l nickel and/or \geq 130 mg/l thallium.

Yes _____ No _____ NA ☒

5. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes _____ No _____ NA ☒

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method and documentation of approval [40 CFR 268.42(b)].

Waste Code	Required Technology	Alternative Method	Approval
_____	_____	_____	_____
_____	_____	_____	_____

Comments: _____

6. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes _____ No ☒

If yes, did the generator select the most stringent treatment standards?
[40 CFR 268.41(b) and 268.43(b)]

Yes _____ No _____

Comments: _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation? [268.7(a)]

Yes ☒ No _____

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes _____ No _____

Comments: _____

2. Which of the following analytical methods does the generator employ?

- a. Knowledge of waste:

Yes ☒ No _____

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

- b. TCLP: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP? (BDAT=stabilization/immobilization technology) Examples: D004-D011, and F001-F009, etc.

Yes _____ No _____ NA ☒

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach sample of typical test results [40 CFR 268.7(a)(5)].

- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis? (BDAT=destruction/removal technology) Examples: D001-D003, majority of P and U wastes, etc.

Yes _____ No ☒ NA _____

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach sample of typical test results [40 CFR 268.7(a)(5)].

- d. PFLT* : Was PFLT used to determine if California List constituents were contained in liquid hazardous waste?

Yes _____ No _____ NA ☒ ALL LIQUID WASTE

* PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach sample of typical test results. [40 C.F.R. 268.7(a)(5)]

3. Does the generator treat restricted wastes in < 90 day tanks or containers regulated under 40 CFR 262.34? (Examples: elementary neutralization, etc)

Yes _____ No ☒ (If No, go to 4)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes _____ No _____

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? [40 CFR 268.7(a)(4)]

Yes _____ No _____ (If No, go to 4)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

_____ Based on a detailed chemical and physical analysis of a representative sample.

_____ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements.

Has the plan been filed with the Regional Administrator (Receipt required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes _____ No _____

Comments: _____

4. Dilution Prohibition [40 CFR 268.3]:

- a. Does the generator mix prohibited* wastes with different treatment standards?

Yes _____ No ☒ (If No, go to b)

List the wastes: _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes _____ No _____

* Prohibited wastes must be treated to established treatment standard prior to land disposal.

Comments: _____

- b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes _____ No ☒ (If No, go to c)

Check appropriate category:

_____ Dilutes to meet treatment standards

_____ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? [40 CFR 268.3(b)]

_____ Managed in treatment systems regulated under the Clean Water Act

_____ Non-Toxic* characteristic wastes

_____ Treatment standard specified in 40 CFR 268.41 or 268.43

* Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted:

- c. Based on an assessment of points a. and b. and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes _____ No ☒

Comments: _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes _____ No _____ NA ☒

C. Management

1. On-Site Management

- a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 days, or disposed on site?

Yes _____ No ☒ (If yes, complete TSD Checklist)

Comments: _____

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to a NJPDES permit are not prohibited (if applicable)? [55FR 22662]

Yes _____ No _____ NA ☒

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR 268 treatment standards are met*? [40 CFR 268.9(d)]

Yes _____ No _____ NA ☒

- * This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 C.F.R. 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards/prohibition levels to an off-site treatment or storage facility?

Yes ☒ No _____ (If No, go to 3)

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ☒ No _____ (If No, go to 3)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes _____ No _____ NA ☒

- b. Is a notification sent with each waste shipment?

Yes ☒ No _____

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) [SQG only]*?

Yes _____ No _____ (If No, go to 3)

- * Small quantity generator = generator of greater than or equal to 100 kg/month but less than 1,000 kg/month hazardous waste, or less than 1 kg/month of acutely hazardous waste. (NJ criteria = <100 kg/month of hazardous waste or <1 kg/month of acutely hazardous waste)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler	Waste Code	Subsequent Handler
_____	_____	_____	_____

Did the SQG provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement [40 CFR 268.7(a)(9)]?

Yes _____ No _____

3. Off-Site Management: Waste Meets Treatment Standards

- a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes _____ No ☒ (If No, go to 4)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____

Note: Include documentation supporting the generator's determination that the waste meets applicable treatment standards/prohibition levels.

Does the generator provide a notification and certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]

Yes _____ No _____ (If No, go to D)

- b. Are a notification and certification sent with each waste shipment?

Yes _____ No _____

If no, is the waste subject to a tolling agreement pursuant to 262.20(e)? (SQG only)

Yes _____ No _____ (If No, go to c)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>	<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____	_____	_____

Did the SQG provide a notification and certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes _____ No _____

- c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes _____ No _____ NA _____ (If No or NA, go to 4)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>	<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____	_____	_____

Are a notification and certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes _____ No _____

4. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ☒ No _____

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ☒ No _____ NA _____

Do LDR documents reflect proper management of wastes previously covered under case by case extensions?

Yes ☒ No _____ NA _____

Comments: _____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes _____ No ☒ (If No, do not complete this section)

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment units and processes</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Are treatment residuals generated from these units?

Yes _____ No _____

Comments: _____

3. Are residuals further treated, stored for greater than 90 days, or disposed on site?

Yes _____ No _____ NA _____

(If yes, the TSD checklist must be completed)

E. Additional Comments, Concerns, or Issues not addressed in the Checklist:

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Waste Minimization Checklist

GENERATOR CHECKLIST =====

MANIFEST

GENERAL 262.20

YES NO N/A

Does the generator, offer for transportation, hazardous waste for off-site treatment/disposal? If yes, proceed to next question. If no, proceed to 264.75/265.75.

☒ ☐ ☐

262.23

Does the generator sign the manifest certification which states;

☒ ☐ ☐

" If I am a large quantity generator, I have a program in place to reduce the volume and toxicity of the waste generated to the degree I have determined to be economically practical and that I have selected the practical method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford."

Does the generator have a written Waste Minimization Plan?

☐ ☒ ☐

If no, is the generator able to describe his plan orally.

☒ ☐ ☐

COMMENTS:

(Explain in this space the areas that visually show evidence that a program is in place and is being implemented)

Recycles degreasing solvent until not usable.

ANNUAL/BIENNIAL REPORT

262.41

YES NO N/A

Has the generator submitted Annual (AR) or Biennial reports (BER) to the appropriate regulatory agency?

☒ ☐ ☐

The inspector should review these reports prior to the inspection (see above), and should try to verify the information in the report during his/her site inspection. The following questions should be addressed during the inspection.

262.56(a)(5)

Does the BER or AR include the efforts undertaken during the year to reduce the volume of toxicity of the wastes generated?

☒ ☐ ☐

Does the BER or AR include a description of the changes in volume and toxicity of the wastes actually achieved during the year in comparison to previous years?

☐ ☐ ☒

Do these efforts match the information contained in the generator's written or verbally described waste minimization program.

☐ ☐ ☒

Is the BER or AR certification signed by the generator or authorized representatives?

☒ ☐ ☐

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
Central Bureau of Field Operations
CN 407, Trenton, N.J. 08625-0407
(609) 584-4150



NOTICE OF VIOLATION

ID NO. NJD055935902 DATE JULY 29, 1993
NAME OF FACILITY KLEINER METAL SPECIALTIES
LOCATION OF FACILITY 4315 NEW BRUNSWICK AVE, SOUTH PLAINFIELD, MIDDLESEX
NAME OF OPERATOR KENNETH CAVE INC

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following alleged violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION

NJAC-7:26-9.7(k) Failure of contingency plan to
be maintained at facility with a copy
sent to local police or fire departments,
hospitals or state or local emergency
response teams.

Remedial action to correct these violations must be initiated immediately and be completed by

AUGUST 19, 1993. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of \$50,000 per violation.

Douglas Greenfield
Investigator, Division of Hazardous Waste Management
Department of Environmental Protection

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
Central Bureau of Field Operations
CN 407, Trenton, N.J. 08625-0407
(609) 584-4150



NOTICE OF VIOLATION

ID NO. NJDOS5935902 DATE JULY 29, 1993
NAME OF FACILITY KLEINER METAL SPECIALTIES
LOCATION OF FACILITY 4315 New Brunswick Ave, South Plainfield, MIDDLESEX
NAME OF OPERATOR KENNETH CAVE XMC

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following alleged violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION
NJAC 7:26-9.6(f) Failure of facility owner & operator to
make required arrangements with police & or
fire departments, emergency response contractors,
equipment suppliers, or local hospital, or to
document any such authority's refusal of such
arrangements SPECIFICALLY (f) 3

Remedial action to correct these violations must be initiated immediately and be completed by

AUGUST 19, 1993. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of \$50,000 per violation.

Douglas Greenfield
Investigator, Division of Hazardous Waste Management
Department of Environmental Protection

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
Central Bureau of Field Operations
CN 407, Trenton, N.J. 08625-0407
(609) 584-4150



NOTICE OF VIOLATION

ID NO. NUD055935902

DATE JULY 29, 1993

NAME OF FACILITY KLEINER METAL SPECIALTIES

LOCATION OF FACILITY 4315 NEW BRUNSWICK AVE. SOUTH BRANFELD, MIDDLESEX

NAME OF OPERATOR KENNETH CAVE XMC

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following alleged violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION

NIAC 7:26-9.4(d)5 Failure of facility owner or operator
to perform daily inspections of each area
where containers are stored

NIAC 7:26-9.4(g) Failure of facility owner or operator
to provide required classroom or on-the-job
training for facility personnel

Remedial action to correct these violations must be initiated immediately and be completed by

August 19, 1993. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of \$50,000 per violation.

Douglas Greenfield
Investigator, Division of Hazardous Waste Management
Department of Environmental Protection

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: April 8, 2015 - 1:15 PM

Version 5.0

User Selection Criteria

Location:	New Jersey, all activities	Activity Location:	None Chosen
Handler ID:	NJD055935902	Group of IDs:	None Chosen
Handler Name:			
Handler Universe:	All Facilities Regardless of Universe		
Determined Date Range:	From: 10/01/1980 To: 04/08/2015		
Location County Code:	None Chosen	Evaluation Type:	
Location City:		Focus Area:	
Location Zip Code:		Violation Type:	
State District:	None Chosen	Display Code Descrip.:	Yes
Sort Order:	Region, State, Handler Name	Display Universes:	Yes

Results

Data meeting the criteria you selected follows.

Total Pages:5 Total Handlers:1

Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

Report Information

Name: cme_foia.rdf
Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed: June 2006
Last Updated: May 2012
Contact: rcrainfo.help@epa.gov
Tables Used: cmecomp3, ccitation3, hreport_univ5, lu_citation, lu_state, hid_groups
Libraries: none

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: April 8, 2015 - 1:15 PM

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KLEINER METAL SPECIALTIES

County Name / Code: MIDDLESEX / NJ023

NJD055935902

REGION 02

Location: 4315 NEW BRUNSWICK AVE; SOUTH PLAINFIELD, NJ 07080

Mailing: 4315 NEW BRUNSWICK AVE; SOUTH PLAINFIELD, NJ 07080

Activity Location: NJ	State District: CENTRAL	Accessibility:	Non-Notifier:	Extract Flag: Y	Active Site: Y
Generator: CEG	Transporter: N	Operating TSDF: -----	IC In Place: N	El Indicator (HE / GW) N / N	
Short-Term Gen: N	Transfer Facility: N	Offsite Receiver: N	HSM: N	Subpart K: -----	
Full Enforcement: -----	Converter: -----	State Unaddressed SNC: N	EPA Unaddressed SNC: N		
CA Wrkld: N	State TSDF: -----	State Addressed SNC: N	EPA Addressed SNC: N		
Active State Gen: N		State SNC w/Comp Sched: N	EPA SNC w/Comp Sched: N		

Violation:	Activity Location: NJ	Type: 262.A	Determined Date: 07/29/1993	Determined by Agency: State	Responsible Agency: State		
Scheduled Compliance Date: 08/19/1993		Actual Compliance Date: 08/31/1993		RTC Qualifier: OBSERVED	Sequence Number: 1		
CSE Evaluation	08/31/1993	Activity Location: NJ	By: State	Identifier: 000	Person: R2DEP	Branch: NJ	Found Violation: YES
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:	
CEI Evaluation	07/29/1993	Activity Location: NJ	By: State	Identifier: 000	Person: R2DEP	Branch: NJ	Found Violation: YES
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:	
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 07/29/1993	Identifier: 000			
Docket:		Agency: State	Responsible Person: R2DEP	Branch: NJ			
CA Component: N		Disposition Status:	Appeal Initiated:	Appeal Resolved:			

Violation:	Activity Location: NJ	Type: 262.A	Determined Date: 07/29/1993	Determined by Agency: State	Responsible Agency: State		
Scheduled Compliance Date: 08/19/1993		Actual Compliance Date: 08/31/1993		RTC Qualifier: OBSERVED	Sequence Number: 2		
CSE Evaluation	08/31/1993	Activity Location: NJ	By: State	Identifier: 000	Person: R2DEP	Branch: NJ	Found Violation: YES
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:	
CEI Evaluation	07/29/1993	Activity Location: NJ	By: State	Identifier: 000	Person: R2DEP	Branch: NJ	Found Violation: YES
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:	
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 07/29/1993	Identifier: 000			
Docket:		Agency: State	Responsible Person: R2DEP	Branch: NJ			
CA Component: N		Disposition Status:	Appeal Initiated:	Appeal Resolved:			

Evaluations With No Violations:

CEI Evaluation	02/28/2007	Activity Location: NJ	By: State	Identifier: 001	Person: COMLE	Branch: C	Found Violation: NO
	Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 02/28/2007		Focus Area:
CDI Evaluation	02/24/2000	Activity Location: NJ	By: State	Identifier: 000	Person: NJPT	Branch: C	Found Violation: NO
	Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
CEI Evaluation	11/23/1987	Activity Location: NJ	By: State	Identifier: 001	Person: R2DEP	Branch:	Found Violation: NO
	Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: April 8, 2015 - 1:15 PM

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Total Number of Handlers: 1

Total Number of Activity Locations: 1

*** End of Report ***

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: April 8, 2015 - 1:15 PM

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Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste <u>subject to RCRA regulations</u> . ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

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FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: April 8, 2015 - 1:15 PM

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Description of codes used on the report:

ACCESSIBILITY - indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):	
Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority:	
Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	indicates that the handler is a former non-notifier.
X	indicates that the handler is a non-notifier.

Violation Type	Description
262.A	GENERATORS - GENERAL

Evaluation Type	Type Description
CDI	CASE DEVELOPMENT INSPECTION
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE
CSE	COMPLIANCE SCHEDULE EVALUATION

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL

* Note: Penalty amount may not reflect all violations cited.

